

IN THE DISTRICT COURT OF THE UNITED STATES FOR THE  
MIDDLE DISTRICT OF ALABAMA, SOUTHERN DIVISION

CLAUDE GENE LEE, SR.,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	CASE NO: 1:06-cv-874-MHT
	)	
WESTPOINT HOME, INC.,	)	
	)	
Defendant.	)	

PLAINTIFF'S EXHIBIT TRIAL DISCLOSURES

COMES NOW the Plaintiff Claude Gene Lee, Sr. ("Lee") and pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure provides the following trial disclosures:

**EXHIBITS:**

1. Declaration of Frank Major, III.
2. Plaintiff's Performance Evaluations for 1997,1998,1999, 2000, 2001, 2002, 2003, 2004, 2005, 1-25-06.
3. WestPoint Homes Position statement to EEOC dated 6/22/06.
4. WestPoint Home and/or Stevens Human Resources Policy Manual.
5. Personnel and/or Corrective Notices to Claude Lee dated 2-16-06; 3-8-06; 3/11/06, 3/13/06.
6. Abbeville Packing Efficiency reports year to date summaries, daily reports, and weekly reports for 2005, 2006, and weeks and days 1/06, 2/06, 3/5/06, 2/12/06, 1/16/06, 12/13/05, 12/19/05, 3/12/06, 2/12/06, 1/3/06, 2/26/06.
7. Mike Ethridge Performance Evaluation dated 1-25-06.
8. Billy Wayne Bedsole Performance Evaluation dated 1-25-06.

9. Plaintiff's EEOC charge, determination letter, and right to sue letter.
10. Abbeville Plant Employee Relations Report for 10/05.
11. Plaintiff Separation Notice and Exit Interview.
12. Plaintiff Employment Record.
13. Commendation to Plaintiff 5/21/01.
14. Plaintiff promotion bulletin to 3<sup>rd</sup> shift supervisor.
15. Plaintiff's application for employment 5/74.
16. Plaintiff's Personnel Notice regarding perfect attendance 1990,1991,1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000.
17. Plaintiff's payroll records from defendant and current position.
18. Damages exhibit reflecting back pay and/or lost pay and benefits for relevant period.
19. Job descriptions for set order puller and supervisor positions.
20. Defendant's employment policies and procedures manual.
21. Defendant's response to unemployment office.
22. Billy Wayne Bedsole personnel notice 2/15/06.
23. Mike Ethridge personnel notice 2/16/06.
24. Defendant's responses to interrogatories and requests for production.
25. Defendant's answer.
26. Timeline exhibit reflecting key events.
27. Plaintiff's personnel file, including all evaluations not listed, pay records, educational and trade background information, and documents reflecting his promotions.
28. Mike Etheridge's personnel file, including all evaluations, job applications, pay records, educational and trade background information, and documents reflecting his promotions and transfers.
29. Billy Wayne Bedsole's personnel file, including all evaluations, job applications, pay records, educational

and trade background information, and documents reflecting his promotions and transfers.

- 30. Documents listed by defendant.
- 31. Any documents needed for rebuttal.
- 32. Plaintiff reserves the right to amend this listing of documents.

/s/ Jay E. Tidwell  
Jay Tidwell (TID009)

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CERTIFICATE OF SERVICE

I hereby certify that on the 11<sup>th</sup> day of September 2007, I have served a copy of the above and foregoing on counsel for all parties by:

- \_\_\_\_\_ Facsimile transmission;
- \_\_\_\_\_ Hand Delivery:
- \_\_\_\_\_ Placing a copy of same in the United States Mail, properly addressed and first class postage prepaid to:
- X   Using the CM/ECF system which will send notifications of such to the following:

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/s/ Jay E. Tidwell  
Of Counsel

/s/ Stephen C. Wallace  
Of Counsel